



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

September 13, 1979

Mr. James G. Keppler, Director  
Directorate of Inspection and  
Enforcement -- Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Byron Station Units 1 and 2  
Response to IE Inspection Report  
Nos. 50-454/79-12 and 50-455/79-12  
NRC Docket Nos. 50-454/455

Reference (a): August 18, 1979 letter from G. Fiorelli  
to Byron Lee, Jr. transmitting IE  
Inspection Report Nos. 50-454/79-17 and  
50-455/79-12

Dear Mr. Keppler:

Reference (a) transmitted an inspection report  
regarding an inspection conducted on July 23-26, 1979 by  
Mr. E. W. K. Lee of your office of activities at Byron  
Station. That report identified two apparent items of  
noncompliance with NRC requirements -- one infraction and  
one deficiency. Attachment A to this letter contains  
Commonwealth Edison Company's response to these items.

Please address any additional questions that you  
might have to this office.

Very truly yours,

*D L Peoples*  
D. L. Peoples  
Director of Nuclear Licensing

attachment

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ATTACHMENT AITEM 1 - INFRACTION

10 CFR 50, Appendix B, Criterion VI states, in part, that "Measures shall be established to control the issuance of documents, .... These measures shall assure that documents, including changes, are reviewed ... and are distributed to and used at the location where the prescribed activity is performed."

Commonwealth Edison Company Topical Report No. CE-1-A, Revision 7, Section 6, states, in part, that "A document control system will be used to assure that documents .... Such documents will be distributed to and used at the locations where the prescribed activity is performed ..."

Hunter Corporation Site Implementing Procedure No. 2.101, Revision 2, Paragraph 7.2.a.2.iii states that "Design specification piping line lists, equipment lists, instruction manuals, or other controlled instructions, when distributed to the Document Stations, shall be on a one copy basis. Design drawings shall be distributed in a controlled manner on an "Internal Transmittal" (Form HC-7). Other design documents will be by controlled distribution and record on the "Document Distribution Status (Form HC-52)."

Contrary to the above, on July 24 and 25, 1979 the inspector established that four (4) Hunter Corporation (Hunter) inter-company correspondences No. HC-QA-05, No. HC-QA-07, No. HC-QA-13 and No. HC-QA-31 issued as supplements to Site Implementing Procedures (SIP) and/or Welding Procedure Specifications (WPS) were not distributed to all SIP and WPS manual holders. Furthermore, three (3) of the correspondences No. HC-QA-05, No. HC-QA-07 and No. HC-QA-13 were not inserted in the copy of the SIP or WPS manuals located in the Containment and Auxiliary Building document station as required by the correspondence.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

The procedure supplements indicated in the noncompliance have been redistributed to the document stations under a more controlled format.

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CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The Site Implementation Procedure (SIP) has been revised to provide a more positive method for identification and distribution of procedure supplements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by September 14, 1979.

ITEM 2 - DEFICIENCY

10 CFR 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, ... and shall be accomplished in accordance with these instructions, ...."

Commonwealth Edison Company Topical Report No. CE-1-A, Revision 7, Section 5, states, in part, that "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable acceptance criteria which must be satisfied to assure that the quality related activity has been properly carried out."

Hunter Corporation Site Implementing Procedure No. 4.001, Revision 2, Paragraph 4-10, states, in part, that "The Quality Control/Welding Inspector is responsible for the as-built Quality Assurance Records and must update them at each inspection point. The inspector will only use the "Construction Copy" of the Process Sheets and Drawing(s) for inspection. His initials on the process sheet in the space marked "Inspected by" will signify his acceptance of that step in the sequence."

Contrary to the above, on July 25, 1979 the inspector established that a QC hold point on weld data sheet for Unit 1 field Weld No. FW299A on Isometric Drawing No. CV-6 was not signed off.

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CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

A Non-Conformance Report (NCR) has been generated to identify the deficiency, i.e., lack of notation on process sheet by inspector. That report also indicates that the hold point for witnessing closure of windows on consumable inserts was not applicable since the weld joint configuration and accessibility did not require windows.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Memorandums have been issued to all area superintendents and quality control inspectors stating that the quality control inspectors should invalidate hold points of this nature.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by September 14, 1979.

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